

1193 RF 93

DUE
DATE

ACTION

DIST. LTR ENC

ENEDETTI, R.L.	
ENJAMIN, A.	
ERMAN, H.S.	
ARNIVAL, G.J.	
OPP, R.D.	
ORDOVA, R.C.	
AVIS, J.G.	
ERRERA, D.W.	
RANZ, W.A.	
ANNI, B.J.	
EALY, T.J.	
EDAH, T.G.	
LBIG, J.G.	
RB, W.A.	
ESTER, A.W.	
ANN, H.P.	
ARX, G.E.	
KENNA, F.G.	
ORGAN, R.V.	
ZZUTO, V.M.	
OTTER, G.L.	
ILEY, J.H.	
ANDLIN, N.B.	
ATTERWHITE, D.G.	
CHUBERT, A.L.	
ETLOCK, G.H.	
ULLIVAN, M.T.	
WANSON, E.R.	
ILKINSON, R.B.	
ILSON, J.M.	

Hutchins

X

Adm Rec IV

CORRESP. CONTROL	x	x
PATS/1130G		

Reviewed for Addressee
Corres. Control RFP7-21-93
DATE BY

Ref Ltr. #

DOE ORDER # 5400

Department of Energy

ROCKY FLATS OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

SEP 21 7 49 AM '93

SEP 17 1993

93-DOE-10927
ROCKY FLATS OFFICE
CORRESPONDENCE CONTROL

Mr. Gary Baughman
Hazardous Waste Facilities Unit Leader
Colorado Department of Health
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Gentlemen:

The DOE is submitting a proposal as agreed by the Operable Unit (OU) No. 4 (Solar Ponds) Extension of Dispute and Process for Resolution agreement (Draft and Final Phase I RFI/RI Report) signed August 13, 1993. Per this agreement the DOE has worked with members of your staff and the Environmental Protection Agency (EPA) to further streamline the Phase II elements of the IAG SOW, paragraph I.B.11.b. This effort has been concurrent with the dispute resolution discussions and some of this streamlining has been reflected in the dispute resolution package forward by DOE letter 93-RF-10270. Consistent with the dispute resolution, the DOE is proposing the following modifications to IAG work under the provisions of Part 32, Additional Work or Modification to Work.

1) Data gathered from the routine monitoring of the RCRA closure action, ongoing operation of the Interceptor Trench System, and any additional data as indicated in the IM/IRA Decision Document (IM/IRA DD) will be used to evaluate the final remediation decisions. As such the fundamental requirements of the Draft and Final Phase II Workplans are met by the IM/IRA DD and these milestones should be eliminated.

2) Evaluation of the success of the Interceptor Trench System and RCRA closure action will be documented as required by RCRA utilizing the data gathered as required by the IM/IRA DD. The performance evaluation will identify the extent and risk of remaining contamination after the IM/IRA is constructed. As such it will fulfill the same need as the Draft and Final Phase II RFI/RI Report, allowing those milestones to be eliminated.

3) If the post-closure performance report indicates contamination of a sufficient risk to warrant further remedial action, the analysis of alternatives to provide that remedial action should be included as part of the same documentation. In that manner the current Draft and Final Phase II Corrective Measures Study/Feasibility Study (CMS/FS) (if needed) are combined with the performance report allowing those milestones to be eliminated.

4) Dialogue between the agencies concerning the IAG, through the Quality Action Team and other forums, has considered restructuring of operable units to align with media or contaminant migration patterns, rather than surface boundaries. This approach is very appropriate for the Solar Ponds (OU4) where groundwater contamination which may require action following pond closure is completely intermingled with OU2 and OU6, and possibly OU7 and OU9. Redefinition of operable units should result in the OU4 groundwater contamination being addressed through the new Groundwater OU. As such all current OU4 milestones for Corrective and Remedial Action Proposed Plan,

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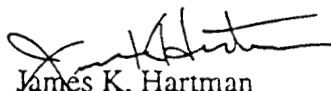
G. Baughman
93-DOE-10927

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Corrective Action Decision/Final Action Decision, Corrective/Remedial Design, and Corrective/Remedial Action should be eliminated. The accomplishment of these task will be completed under a more appropriate and comprehensive Groundwater OU.

The attached crosswalk recaps the proposal described above. We believe this proposal is consistent with our mutual intent to further streamline the regulatory process and focus on real accomplishment. Although a new Groundwater OU has not yet been established allowing the current OU4 milestones to immediately be replaced, we propose that this correspondence serve as the catalyst to begin focused dialogue on that effort. You should know that I am thoroughly committed to remediation of the entire Rocky Flats Plant as quickly as achievable under our budget constraints, and I will continue to propose innovative ways to accelerate any necessary cleanup.

Sincerely,


James K. Hartman
Assistant Manager for Transition
and Environmental Restoration

Enclosure

cc w/Enclosure:
J. Hartman, AMTER, RFO

R. Greenberg, EM-453
A. Rampertaap, EM-453
H. Belencan, EM-453
A. Pauole, OOM, RFO
R. Schassburger, ERD, RFO
M. Hestmark, EPA
N. Hutchins, EG&G
J. Keith, BOR

Attachment

IAG MILESTONE CROSSWALK

<u>MILESTONE</u>	<u>CURRENT</u>	<u>PROPOSED</u>
Submit Draft Phase II RFI/RI Work Plan	4/22/94	Delete*
Submit Final Phase II RFI/RI Work Plan	9/19/94	Delete*
Submit Draft Phase II RFI/RI Report	4/16/96	Delete**
Submit Final Phase II RFI/RI Report	9/11/96	Delete**
Submit Draft Phase II CMS/FS Report	12/5/96	Delete**
Submit Final Phase II CMS/FS Report	6/9/97	Delete**
Submit Draft Phase II Proposed Plan	6/9/97	Delete***
Submit Final Phase II Proposed Plan	9/5/97	Delete***
Submit Phase II Responsiveness Summary	1/16/98	Delete***
Submit Final Phase II Resp. Summary	4/14/98	Delete***
Submit Draft Phase II CAD/FAD	4/14/98	Delete***
Submit Final Phase II CAD/FAD	7/14/98	Delete***
Submit CD/RD Work Plan	7/14/98	Delete***
Submit Draft Title II Design	3/15/99	Delete***
Submit Final Title II Design	6/14/99	Delete***
Begin RA/CA Construction	1/18/00	Delete***

* These elements are already incorporated in the IM/IRA Decision Document as developed through the dispute resolution process.

** These elements will be included in the performance reports for the Interceptor Trench System and RCRA Closure IM/IRA.

*** These elements will be addressed and appropriate milestones developed in a newly defined Operable Unit which will be media or contaminant pathway specific.